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September 22, 2020

Hon. Andrew T. Baxter, U.S. Magistrate Judge
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

RE: 4th Letter Motion to Enlarge Time by 90 Days, *John Doe v. Syracuse, et al.*, No. No. 5:19-cv-190 (N.D.N.Y.)

Your Honor,

According to Fed.R.Civ.P. 6(b)(1)(A) and NDNY LR 16.1(f), Plaintiff John Doe in the above-captioned action moves with the consent of Defendants Syracuse University, at al. to enlarge all deadlines by 90 days.

I. THE UNIFORM PRETRIAL SCHEDULING ORDER

This Court amended its Uniform Pretrial Scheduling Order by Order of June 18, 2020. Dk#58. The following deadlines apply:

September 28, 2020	Plaintiff's Expert Disclosure
November 16, 2020	Defendant's Expert Disclosure
November 30, 2020	Defendants' and Plaintiff's Rebuttal Expert Disclosure
December 29, 2020	Completion of Discovery
March 15, 2021	Substantive Motion Deadline

II. GOOD CAUSE FOR 3RD ENLARGEMENT OF TIME

Plaintiff moves for a fourth enlargement of the above deadlines for good cause as follows:

Defendants have yet to conclude their production of documents and tangible things, including those that are subject to the Court's decision on Plaintiff's Letter Motion to Compel and pending appeal of the Magistrate Judge's decision ordering disclosure of certain documents of RP's advisor and counselor at Syracuse, on which supplemental briefing has been ordered by Judge Sannes. See Dk#51, 56, 60-66.

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Defendants and Plaintiff have continued to work together on search terms and custodians to cull discoverable documents, but these documents have not yet been produced. Several discovery disputes remain pending, although the parties are working in good faith to resolve them.

In addition, Plaintiff, Defendants, and, indeed, the federal court system as a whole is adjusting to the current pandemic, which will interrupt and has postponed the parties' planned deposition schedule.

Given where the parties are in discovery at the present time and the interruption caused by the COVID-19 pandemic, undersigned counsel to Plaintiff contacted Defendants' counsel by email on or around September 21, 2020, and Attorney Buster Melvin conveyed Defendants' consent to an additional 90-day extension of time.

This is the fourth request for an enlargement of discovery time. No party will be prejudiced by the proposed consented-to enlargement of time.

III. PROPOSED SCHEDULING ORDER

Plaintiff's therefore propose the following 90-day consented-to extension of all deadlines subject to the Court's Uniform Pretrial Scheduling Order:

January 4, 2021	Plaintiff's Expert Disclosure
February 15, 2021	Defendant's Expert Disclosure
February 29, 2021	Defendants' and Plaintiff's Rebuttal Expert Disclosure
March 29, 2021	Completion of Discovery
June 14, 2021	Substantive Motion Deadline

Sincerely,



Michael Thad Allen

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CERTIFICATE OF SERVICE

I hereby certify that on the date specified in the caption of this document, I electronically filed the foregoing with the Clerk of Court, to be served on all parties of record via the CM/ECF system.

/s/Michael Thad Allen

Michael Thad Allen